



Background

The mission of Backcountry Hunters and Anglers (BHA) is to ensure the heritage of hunting and angling in natural, wild environments. Wilderness hunting and fishing deliver a sense of freedom, challenge, and solitude that is increasingly threatened by the twin pressures of population growth and technological advances. With over 40,000 members and supporters, BHA is the fastest growing conservation organization in North America. Our local Alberta chapter shares the same vision with an active and engaged community driven by conservation, access to wild lands and waters, and science-based land and wildlife management.

The potential for open pit coal mining, strip mining, mountaintop removal mining, or any other coal development in Alberta's Eastern Slopes raises a number of serious concerns for our members.

Concerns

- Loss of public access for hunting, camping, fishing, and hiking.
- Change in character and sense of place and loss of recreation opportunities, particularly hunting and fishing.
- Impacts of exploration and development activities on wildlife habitat quality and quantity.
- Alteration of water flows and risk of contamination, particularly related to selenium.
- Incongruity with regional and subregional land management plans.
- Lack of transparency from the Government of Alberta in complying with FOIP requests

Overview

The picturesque mountains, foothills, and streams of the Eastern Slopes are visited by thousands of Albertan hunters and anglers year-round. The conversion of these truly unique features to accommodate coal development and the resulting potential impacts to native fish would harm the reputation of the region as a fly-fishing destination and greatly impact the outdoor recreation industry that relies on the wild character of the region. The land allocations given to these mines would also restrict Albertans from accessing previously public land to hunt, fish, and recreate on; lands which the government has been entrusted to preserve for its citizens.

Mine exploration and development would cause habitat loss and fragmentation for many important game species. Like Alberta's native fish, many of these wildlife species are sensitive to high densities of roads as well as disturbance from human activities – particularly high impact activities such as large-scale mining exploration and development. In conjunction with the already high loss of habitat and impacts of human disturbances in the Eastern Slopes, the cumulative effects of increasing development could be significant. Cumulative stresses increase direct and indirect mortality, lower reproductive success, and alter seasonally important movement patterns.

Recommendations

Given the above concerns, BHA is opposed to all coal exploration and development in category II and IV lands. We ask that all exploration and mine proposals not resume until comprehensive public consultation has been conducted and land-use planning that protects these sensitive ecological areas has been completed. This planning should not be limited to coal development, should include the cumulative effects of all human activities in the region, take into account all stakeholder and Indigenous concerns, and be legally binding.

Further, we believe the scope of this consultation must be expanded beyond what is currently being proposed. As we understand it, the terms of reference exclude the Committee from considering factors outside of the scope of the Ministry of Energy, meaning issues such as land use and water management cannot be discussed. Due to the impact of coal mining on land use and water quality, especially as it relates to loss of hunting and angling opportunity, we believe that these issues must be discussed.

It also has been noted that there has been a lack of transparency from the Ministry of Energy. FOIP requests, by BHA, for materials and documentation that identified how the Ministry made decisions to support the rescinding of the coal policy have had their 30-day timelines exceeded, continually extended, and unfulfilled. We believe that the government needs to be transparent, especially on decisions of this magnitude and impact on Alberta citizens.

Alberta BHA's vision for the Eastern Slopes is one that prioritizes our watersheds, wilderness, wildlife, and public access, and does not include coal development. We believe that our Eastern Slopes should be a place that:

- Provides clean drinking water for millions of Albertans and Canadians.
- Provides functional habitat for fish, wildlife, and species at risk.
- Offers hunting, fishing, and other recreation opportunities to generations of Albertans.
- Honours the Treaty rights of First Nations on their traditional lands.
- Supports sustainable agriculture, tourism and recreation economies.
- Helps Alberta combat climate change by storing carbon in its trees, plants, and soils.

We as an organization will continue to be active in these matters, keeping our members informed and engaged through the consultation process.

Thank you for your time and consideration.



Neil Keown, Chair

c/o Alberta Backcountry Hunters and Anglers Association

<https://www.backcountryhunters.org/alberta>